

MILLER & CHEVALIER CHARTERED

655 Fifteenth Street, N.W.

Suite 900

Washington, D.C. 20005

(202) 626-5800

Anthony F. Shelley (Admitted Pro Hac Vice)

Timothy P. O'Toole (Admitted Pro Hac Vice)

Attorneys for Dennis Black and Charles Cunningham,

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
:
:
DELPHI CORPORATION, et al., :
: Case No. 05-44481 (RDD)
Debtors. :
: (Jointly Administered)
-----X-----

MILLER CHEVALIER CHARTERED'S VERIFIED RULE 2019 STATEMENT

The law firm of Miller & Chevalier Chartered (“MCC”) files this Statement of Multiple Representation, pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Statement”), and respectfully sets forth as follows:

1. MCC is a law firm representing the following parties (“Parties”) with respect to the chapter 11 cases of the above-captioned debtors (“Debtors”):

a. **Dennis Black**
416 Willow Brook Way
Chesapeake, VA 23320-3560

b. **Charles Cunningham**
8835 Stoneridge Dr., SE
Warren, Ohio 44484

2. The Parties listed above either (a) hold claims against the Debtors, or (b) are parties to certain agreements with the Debtors that may be affected by the Debtors' chapter 11 cases.

3. Dennis Black and Charles Cunningham are intervening parties¹ in connection with the Debtors' proposed modifications to the First Amended Plan of Reorganization, dated June 1, 2009 ("Proposed Modified Plan"). Specifically, the Proposed Modified Plan references a recent agreement with the Pension Benefit Guaranty Corporation ("PBGC"), which – when effectuated – will result in the termination of the Delphi Retirement Program for Salaried Employees ("Salaried Workers Plan"). For this reason, the Parties have filed an Objection to the Proposed Modified Plan. The Parties interests are aligned in this matter and have each agreed to MCC representing them jointly herein.

4. MCC was approached by the Parties separately, who separately asked MCC to act for them in these chapter 11 cases. MCC will continue to represent these parties separately and individually in matters related to the Debtors' chapter 11 cases. MCC may similarly undertake additional representations of additional parties and to the extent MCC does so, this Statement will be amended as appropriate.

5. MCC reserves the right to further supplement or amend this Statement.

Dated: New York, New York
July 29, 2009

¹ The Parties filed a motion, dated July 15, 2009, to intervene in this case ("Motion") in an abundance of caution to the extent that they would not be considered an "Interested Party" under the Bankruptcy Code. That motion was approved at the Court's hearing on the Motion on July 23, 2009. An Order approving the Motion will be presented to the Court for signature at the emergency hearing on the Debtors' Emergency Automatic Stay Enforcement Motion, dated July 22, 2009.

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By: /s/Anthony F. Shelley

Anthony F. Shelley (Admitted Pro Hac Vice)
Timothy P. O'Toole (Admitted Pro Hac Vice)

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I, Anthony F. Shelley, verify under penalty of perjury that the foregoing statements are true and correct to the best of my information, knowledge and belief.

/s/Anthony F. Shelley
ANTHONY F. SHELLY